

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MISSOURI**

BILLIE RODRIGUEZ, DANIEL ERWIN,  
MICHAEL B. ACKERMAN, and KYLE  
FOREMAN, individually and on behalf of all  
others similarly situated,

Plaintiffs,

vs.

EXXON MOBIL CORPORATION,  
CHEVRON USA, INC., CHEVRON  
PHILLIPS CHEMICAL CORPORATION,  
DUPONT de NEMOURS, CELANESE  
CORPORATION, DOW INC., DOW  
CHEMICAL COMPANY, EASTMAN  
CHEMICAL COMPANY,  
LYONDELLBASELL INDUSTRIES N.V.,  
AND AMERICAN CHEMISTRY COUNCIL,

Defendants,

and

STATE OF KANSAS, *ex rel.* KRIS W.  
KOBACH, Attorney General,

Defendant-Intervenor.

Case No. 4:24-cv-00803-SRB

**DECLARATION OF KARI ENDRIES**

I, Kari Endries, declare under penalty of perjury that the foregoing is true and correct:

1. I am Secretary & Vice President of Chevron U.S.A. Inc. (“CUSA”). My job responsibilities for CUSA include corporate governance support, such as overseeing the filing of governance documents with relevant Secretary of State agencies, overseeing appointment of officers and directors, minuting relevant transactions, and maintaining the governance records of the Company.

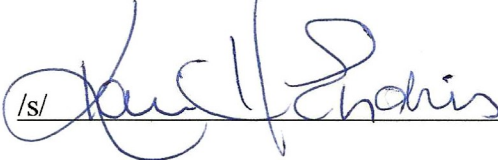
2. Defendant CUSA is a Pennsylvania corporation. CUSA's principal place of business is in San Ramon, California.
3. I understand that this case concerns certain plastic resins, namely polyethylene terephthalate, polyethylene, polypropylene, polystyrene, polycarbonate, high density polyethylene, and low density polyethylene.
4. CUSA does not currently and has never produced, manufactured, marketed, advertised, or sold any plastic resins including polyethylene terephthalate, polyethylene, polypropylene, polystyrene, polycarbonate, high density polyethylene, and low density polyethylene.
5. Prior to May 23, 2000, the only corporate affiliate of CUSA that had produced, manufactured, marketed, advertised, or sold plastic resins in the United States was Chevron Chemical Company, which later became Chevron Chemical Company LLC ("Chevron Chemical"). But pursuant to an agreement dated May 23, 2000, Chevron Chemical was conveyed to Chevron Phillips Chemical Company LLC ("CPChem").<sup>1</sup> CPChem is a limited liability company that is owned 50 percent by CUSA and 50 percent by Phillips 66 Company, a subsidiary of Phillips 66.
6. Because CUSA does not currently and has never operated a plastic resins business of its own, it has not done any of the following:
  - a. distributed, supplied, marketed, advertised, or sold products to end-consumers that were manufactured with plastic resins it produced or manufactured;

---

<sup>1</sup> A copy of the agreement with CPChem can be found at the U.S. Securities and Exchange Commission website at <https://www.sec.gov/Archives/edgar/data/1127399/000095012301502180/y47109a1ex10-1.txt>.

- b. rented, leased, owned, used or operated a manufacturing facility, office, or real property in Missouri related to any plastic resins business;
- c. held any mailing address, telephone number, bank accounts, or post office boxes in Missouri related to any plastic resins business;
- d. developed, tested, designed, assembled, manufactured, packaged, labeled or prepared any plastic resins in Missouri;
- e. specifically directed or targeted advertising or marketing of any plastic resins at Missouri;
- f. owed or paid income or real estate taxes or similar fees in Missouri related to any plastic resins business;
- g. had any employees or agents in Missouri, or contracted with entities based in Missouri, related to any plastic resins business.

Dated: March 9, 2025

  
/s/ \_\_\_\_\_  
Kari Endries